

1 MICHAEL C. VAN, ESQ.  
2 Nevada Bar No. 3876  
3 GARRETT R. CHASE, ESQ.  
4 Nevada Bar No. 14498  
5 VC2 LAW  
6 8985 S. Eastern Ave., Suite 100  
7 Las Vegas, Nevada 89123  
8 Telephone: (702) 478-7770  
9 Facsimile: (702) 478-7779  
10 Email: michael@vc2law.com  
11 garrett@vc2law.com

12 *Attorneys and Local Counsel for Plaintiffs*

13 FARHAD NOVIAN (California Bar No. 118129; admitted pro hac vice)  
14 farhad@novianlaw.com  
15 ANDREW B. GOODMAN (California Bar No. 267972; admitted pro hac vice)  
16 agoodman@novianlaw.com  
17 NOVIAN & NOVIAN, LLP  
18 1801 Century Park East, Suite 1201  
19 Los Angeles, CA 90067  
20 Telephone: (310) 553-1222  
21 Facsimile: (310) 553-0222

22 *Attorneys for Plaintiffs*

23 **UNITED STATES DISTRICT COURT**  
24 **FOR THE DISTRICT OF NEVADA**

25 MARIA TSATAS, an individual; LEONIDAS  
26 VALKANAS, as trustee of the KEET TRUST  
27 dated August 1, 2015; RAYMOND BARAZ,  
28 an individual; PASCAL ABDALLAH, an  
individual; JIMMY TSOUTSOURAS, an  
individual; FOTINI VENETIS, an individual;  
NICHOLAS TSOUTSOURAS, an individual;  
CONNIE TSOUTSOURAS, an individual;  
RAYMONDE KANHA, an individual;  
ALFRED BEKHIT, an individual; JACQUEZ  
ELBAZ, an individual; MARTINE  
BENEZRA, an individual; JAMES P.  
CARROLL, an individual; DAVID CHIN, an  
individual; JENNIFER MILLS, an individual;  
PAUL SUBLETT, an individual; ANDREW  
SUBLETT, an individual; MANOLIS  
KOSTAKIS, an individual; ESTHER  
GEORGAKOPOULOS, an individual;  
EVAGELIA KOSTAKIS, an individual;  
DENIS PARSONS, an individual; SOFIA  
KARDARAS, an individual; JIMMY  
ASMAKLIS, an individual; CORRADINO

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATED REQUEST FOR  
SETTLEMENT CONFERENCE**

**(First Request)**

1 GALUPPO, an individual; DENIS KOPITAS,  
2 an individual; TERRY TSATAS, an  
3 individual; GEORGE TSATAS, an individual;  
4 PANAGIOTA TSATAS, an individual;  
5 OURANIA TSATAS, an individual;  
6 KIRIAKOS PRIMBAS, an individual;  
7 EVANTHIA PRIMBAS, an individual;  
8 PATRICK AYOUB, an individual; MICHAEL  
9 BESCEC, an individual; ERNEST LEBOEUF,  
an individual; PHILIPPE LEGAULT, an  
individual; EFTIHIOS LITSAKIS, an  
individual; GIOVANNI MONCADA, an  
individual; MARC RIEL, an individual;  
JARADEH SALIM, an individual; HANI  
HAMAM, an individual; CONSTANTIN  
ZISSIS, an individual; BESSIE PEPPAS, an  
individual; NIKI PALIOVRAKAS, an  
individual,

10 Plaintiffs,

11 v.

12 AIRBORNE WIRELESS NETWORK, INC., a  
13 Nevada Corporation; MICHAEL J. WARREN,  
14 an individual; J. EDWARD DANIELS, an  
individual; MARIUS DE MOS, an individual;  
15 JASON DE MOS, an individual; ROBERT  
BRUCE HARRIS, an individual; KELLY  
KABILAFKAS, an individual; and  
APCENTIVE, INC., a Nevada Corporation,

16 Defendants.

VC2 LAW

8985 South Eastern Avenue, Suite 100  
Las Vegas, Nevada 89123  
Tel: (702) 478-7770 o Fax: (702) 478-7779

1                   **STIPULATED REQUEST FOR SETTLEMENT CONFERENCE**

2                   Plaintiffs<sup>1</sup> and Defendants (as listed in the above caption, with the exception of the  
 3 deceased defendant Marius de Mos) (together, the “Parties”), by and through their undersigned  
 4 counsel of record, submit this Stipulated Request for Settlement Conference pursuant to LR 16-5  
 5 and page 2 of the Chambers Practices of The Honorable Richard F. Boulware, II<sup>2</sup>, as well as LR  
 6 IA 6-1 and LR IA 6-2.

7                   WHEREAS, this is the Parties’ first request for Settlement Conference.

8                   WHEREAS, on March 31, 2025, the Court issued its ruling on Plaintiffs’ Motion for Partial  
 9 Summary Judgment and *Daubert* Motions. ECF No. 325.

10                  WHEREAS, the Parties have engaged in preliminary settlement discussions since the  
 11 Court’s March 31, 2025 Order.

12                  WHEREAS, the Parties are currently required to submit an amended joint pretrial order by  
 13 June 2, 2025 (ECF No. 325).

14                  WHEREAS, the Parties wish to further explore the possibility of settlement and wish to  
 15 narrow any issues for trial to the extent possible.

16                  WHEREAS, the Parties would be available for a settlement conference as early as May 14,  
 17 2025, but are not available on the following dates for the remainder of May: May 20, 22, 23, 27,  
 18 28, 29, 30. In June, the Parties are available on all days except: June 4, 16, 18, 30.

19                  WHEREAS, the Parties are agreeable to having counsel and the Parties appear remotely  
 20 because counsel and the Parties are located in different states and countries.

21                  THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by

---

22                  <sup>1</sup> As listed in the above caption, with the exception of the ten named plaintiffs for whom the  
 23 Court granted a Motion to Withdraw (ECF No. 219).

24                  <sup>2</sup> “Generally, a case will be referred to the assigned Magistrate Judge for a settlement conference  
 25 pursuant to Local Rule 16-5 after dispositive motions are fully briefed. In those cases, Judge  
 26 Boulware will usually stay the ruling and provide the parties the opportunity to participate in the  
 27 settlement conference before the dispositive motions are addressed. If no dispositive motions are  
 28 filed, the case will generally be referred for a settlement conference as soon as the Joint Pretrial  
 Order is filed. However, parties may file a written request for an early pretrial conference  
 pursuant to Local Rule 16-2.”

1 and through their respective attorneys of record, that, for good cause and pursuant to LR 16-5 and  
 2 page 2 of the Chambers Practices of The Honorable Richard F. Boulware, II, that this case is  
 3 ordered to a settlement conference before a Magistrate on the soonest available date on the  
 4 assigned Magistrate's calendar that the Parties and their counsel are all available. The deadline to  
 5 submit an amended joint pretrial order is hereby stayed pending the outcome of the settlement  
 6 conference.

7 **IT IS SO STIPULATED.**

8  
 9 DATED: May 13, 2025

Respectfully submitted.

10  
 11 By: /s/ Andrew B. Goodman  
 12 MICHAEL C. VAN, ESQ. #3876  
 13 GARRETT R. CHASE, ESQ. #14498  
**VC2 LAW**  
 14 8985 S. Eastern Ave., Suite 100  
 15 Las Vegas, Nevada 89123

16 FARHAD NOVIAN  
 17 ANDREW B. GOODMAN  
 (admitted pro hac vice)  
**NOVIAN & NOVIAN, LLP**  
 1801 Century Park East, Suite 1201  
 Los Angeles, CA 90067  
*Attorneys for Plaintiffs*

19 DATED: May 13, 2025

Respectfully submitted.

20  
 21 By: s/ Peter L. Chasey  
 22 PETER L. CHASEY, ESQ. #7650  
 23 CHASEY LAW OFFICES  
 24 3295 N. Fort Apache Road, Suite 110  
 Las Vegas, Nevada 89129  
*Attorneys for Defendants Airborne Wireless Network, Inc., Apcentive, Inc., Robert Bruce Harris, Michael J. Warren, Jason de Mos, and Kelly Kabilafkas*

25 DATED: May 13, 2025

Respectfully submitted.

26  
 27 By: s/ Michael Tremonte  
 28 PATRICK H. HICKS, ESQ. #131509

1 KAREN KAO, ESQ., #14386  
2 LITTLER MENDELSON, P.C.  
3 3960 Howard Hughes Parkway, Suite 300  
Las Vegas, Nevada 89169

4 MICHAEL TREMONTE  
5 (admitted pro hac vice)  
6 SHER TREMONTE LLP  
90 Broad St. 23rd Floor  
New York, NY 10004  
7 *Attorneys for Defendant J. Edward Daniels*

8 **IT IS SO ORDERED.**

9 **DATED** this 14th day of May, 2025.



---

10  
11 **RICHARD F. BOULWARE, II**  
12 **UNITED STATES DISTRICT JUDGE**

VC2 LAW

8985 South Eastern Avenue, Suite 100  
Las Vegas, Nevada 89123  
Tel: (702) 478-7770 o Fax: (702) 478-7779

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On May 13, 2025, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

<p>Peter L. Chasey, Esq. Chasey Law Offices 3295 N. Fort Apache Road, Suite 110 Las Vegas, Nevada 89129 Email: <a href="mailto:peter@chaseylaw.com">peter@chaseylaw.com</a></p>	<p><input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via CM/ECF</p>
<p>Patrick H. Hicks Email: <a href="mailto:phicks@littler.com">phicks@littler.com</a></p>	
<p>Karen Kao Email: <a href="mailto:kkao@littler.com">kkao@littler.com</a></p>	
<p>Michael Tremonte Email: <a href="mailto:mtremonte@shertremonte.com">mtremonte@shertremonte.com</a></p>	
<p>Marius de Mos Email: <a href="mailto:wind-power@msn.com">wind-power@msn.com</a></p>	

DATED May 13, 2025.

/s/ Amanda McGill  
Amanda McGill – Legal Assistant  
Novian & Novian, LLP  
1801 Century Park East, Suite 1201  
Los Angeles, CA 90067  
Tel: (310) 553-1222  
Fax: (310) 553-0222  
Email: amanda@novianlaw.com